

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

In re:	)	Chapter 11
TEHUM CARE SERVICES, INC.,	)	Case No. 23-90086 (CML)
Debtor.	)	<i>Pending in the United States Bankruptcy</i>
	)	<i>Court for the Southern District of Texas</i>
THE CURATORS OF THE UNIVERSITY	)	
OF MISSOURI and CAPITAL REGION	)	
MEDICAL CENTER,	)	Adversary Proceeding No. 23-04005-drd
Plaintiffs,	)	<i>Removed from the Circuit Court of</i>
	)	<i>Boone County, Missouri, Division 4</i>
v.	)	<i>Case No. 22BA-CV01701-01</i>
TEHUM CARE SERVICES, INC. d/b/a	)	
CORIZON HEALTH, INC., CHS TX, INC.	)	
and YESCARE CORP.,	)	
Defendants.	)	

**MOTION OF TEHUM CARE SERVICES, INC.  
D/B/A CORIZON HEALTH, INC. TO TRANSFER VENUE TO THE  
SOUTHERN DISTRICT OF TEXAS PURSUANT TO 28 U.S.C. § 1412 AND  
RULE 7087 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Tehum Care Services, Inc. d/b/a Corizon Health, Inc., one of the above-captioned defendants and the above-captioned chapter 11 debtor and debtor in possession (“Tehum” or the “Debtor”), for its *Motion to Transfer Venue to the Southern District of Texas Pursuant to 28 U.S.C. § 1412 and Rule 7087 of the Federal Rules of Bankruptcy Procedure* (the “Motion”), respectfully represents as follows:

1. By this Motion, Tehum requests entry of an order, substantially in the form attached hereto as **Exhibit A**, transferring the above-referenced adversary proceeding to the United States Bankruptcy Court for the Southern District of Texas, Houston Division.

2. Pursuant to the applicable local rules of this Court, separate Suggestions in Support are being filed contemporaneously with this Motion and are incorporated herein by reference.

WHEREFORE the Debtor requests that this Court transfer this Adversary Proceeding to the United States Bankruptcy Court for the Southern District of Texas, Houston Division, and grant such other relief as may be appropriate.

Respectfully submitted this 20th day of February, 2023.

**MARTIN, PRINGLE, OLIVER,  
WALLACE & BAUER, L.L.P.**

*/s/ Scott B. Haines*

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Scott B. Haines MO #32525  
B. Scott Tschudy MO # 46736  
6401 Indian Creek Parkway  
Overland Park, Kansas 66210  
Telephone: (913) 491-5500  
Facsimile: (913) 491-3341  
Email: sbhaines@martinpringle.com  
bstschudy@martinpringle.com

*-and-*

**GRAY REED**

*/s/ Jason S. Brookner*

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Jason S. Brookner (*pro hac vice*)  
Texas Bar No. 24033684  
1300 Post Oak Boulevard, Suite 2000  
Houston, Texas 77056  
Telephone: (713) 986-7000  
Facsimile: (713) 986-7100  
Email: jbrookner@grayreed.com

*Counsel to Tehum Care Services, Inc. d/b/a  
Corizon Health, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on the 20th day of February, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Western District of Missouri, as well as via e-mail on counsel to Plaintiff and the other Defendants as follows:

**Counsel to Plaintiffs:**

Patrick Stueve ([stueve@stuevesiegel.com](mailto:stueve@stuevesiegel.com));  
Ethan Lange ([lange@stuevesiegel.com](mailto:lange@stuevesiegel.com));  
Jordan Kane ([kane@stuevesiegel.com](mailto:kane@stuevesiegel.com))

**Counsel to YesCare and CHS TX, Inc.:**

Sam Hershey ([sam.hershey@whitecase.com](mailto:sam.hershey@whitecase.com))  
Phil Cantwell ([pcantwell@dowdbennett.com](mailto:pcantwell@dowdbennett.com))  
Robyn Parkinson ([rparkinson@dowdbennett.com](mailto:rparkinson@dowdbennett.com))

*/s/ Jason S. Brookner*

\_\_\_\_\_  
Jason S. Brookner

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

In re:	)	Chapter 11
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THE CURATORS OF THE UNIVERSITY	)	
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TEHUM CARE SERVICES, INC. d/b/a	)	
CORIZON HEALTH, INC., CHS TX, INC.	)	
and YESCARE CORP.,	)	
Defendants.	)	

## ORDER GRANTING MOTION TO TRANSFER VENUE

Upon the *Motion of Tehum Care Services, Inc. d/b/a Corizon Health, Inc. to Transfer Venue to the Southern District of Texas Pursuant to 28 U.S.C. § 1412 and Rule 7087 of the Federal Rules of Bankruptcy Procedure* (the “Motion”);<sup>1</sup> and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and venue being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and there being due and sufficient notice of the Motion; and the Court having reviewed and considered the Motion and any responses and/or

<sup>1</sup> Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Motion or the accompanying Suggestion in Support, as applicable.

objections thereto and after having considered the arguments made and evidence admitting at the hearing on the Motion and after due deliberation and good and sufficient cause appearing therefor, finds as follows:

1. The Motion is GRANTED.

2. The Clerk's Office is hereby directed to take all steps necessary to effectuate the transfer of this adversary proceeding, including all papers filed herein, to the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "Texas Bankruptcy Court"), upon which the adversary proceeding may be linked to the above-referenced bankruptcy case, as the Texas Bankruptcy Court deems appropriate. All deadlines in the adversary proceeding shall be abated pending a status conference held and a new scheduled order entered by the Texas Bankruptcy Court.

3. The Court shall retain jurisdiction over the interpretation or implementation of this Order.

Signed: \_\_\_\_\_, 2023

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Dennis R. Dow  
United States Bankruptcy Judge

Submitted by:

**MARTIN, PRINGLE, OLIVER, WALLACE &  
BAUER, L.L.P.**

Scott B. Haines MO #32525

B. Scott Tschudy MO # 46736

6401 Indian Creek Parkway

Overland Park, Kansas 66210

Telephone: (913) 491-5500

Facsimile: (913) 491-3341

Email: sbhaines@martinpringle.com  
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Jason S. Brookner (*pro hac vice*)

Texas Bar No. 24033684

1300 Post Oak Boulevard, Suite 2000

Houston, Texas 77056

Telephone: (713) 986-7000

Facsimile: (713) 986-7100

Email: jbrookner@grayreed.com

*Counsel to Tehum Care Services, Inc. d/b/a Corizon  
Health, Inc.*